

JAP:RTP

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UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA

C O M P L A I N T

- against -

(21 U.S.C. §§ 952(a)
and 960)

LOREINNE CABRERA,

Defendant.

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EASTERN DISTRICT OF NEW YORK, SS:

Vincent Marino, being duly sworn, deposes and states that he is a Special Agent of the United States Department of Homeland Security, Homeland Security Investigations, duly appointed according to law and acting as such.

Upon information and belief, on or about June 5, 2012, within the Eastern District of New York and elsewhere, the defendant LOREINNE CABRERA did knowingly, intentionally and unlawfully import into the United States from a place outside thereof a substance containing heroin, a Schedule I controlled substance.

(Title 21, United States Code, Sections 952(a) and 960).

The source of your deponent's information and the grounds for his belief are as follows:¹

1. On or about June 5, 2012, the defendant LOREINNE CABRERA arrived at John F. Kennedy International Airport in Queens, New York, aboard JetBlue flight 824 from Santo Domingo, Dominican Republic.

2. The defendant LOREINNE CABRERA was selected for a Customs and Border Protection ("CBP") examination. The defendant was asked to put her suitcase on the exam table and was asked if everything inside the suitcase belonged to her. The defendant responded "yes."

3. During an inspection of the suitcase, a CBP officer noticed that the sides of the suitcase were unusually thick. A probe of the side of the suitcase revealed a brown, powdery substance, which field-tested positive for the presence of heroin.

4. The total approximate gross weight of the heroin found in the defendant LOREINNE CABRERA's suitcase is 1,523 grams.

^{1/} Because the purpose of this Complaint is to set forth only those facts necessary to establish probable cause, I have not described all the relevant facts and circumstances of which I am aware.

WHEREFORE, your deponent respectfully requests that
defendant LOREINNE CABRERA be dealt with according to law.



Vincent Marino
Special Agent
U.S. Department of Homeland Security
Homeland Security Investigations

Sworn to before me this
6th day of June, 2012

THE HONORABLE JOAN M. AZRACK
UNITED STATES MAGISTRATE JUDGE
EASTERN DISTRICT OF NEW YORK